



Annual 47 C.F.R. 64.2009(e) CPNI Certification

Annual 64.2009(e) CPNI Certification for 2007 - REVISED

Date filed: February 28, 2008 (Revised: September 17, 2008)

Name of company covered by this certification: Delhi Telephone Company and DTC Cable, Inc.

Form 499 Filer ID: 808848 and 826492

Name of signatory: Stephen Oles

Title of signatory: CPNI Compliance Officer

CERTIFICATION

I am the CPNI Compliance Officer for the Delhi Telephone Company and its wholly-owned subsidiary DTC Cable, Inc. ("the Delhi Companies"). I hereby certify that I have personal knowledge that Delhi Companies have established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. 64.2001 et seq. Accompanying this certificate is a statement explaining how the Delhi Companies are in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules. The Delhi Companies have not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. The Delhi Companies have not received any customer complaints in the past year concerning the unauthorized release of CPNI.

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I hereby certify that the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with FCC rules.

A handwritten signature in black ink, reading 'Stephen Oles', is written over a horizontal line.

Stephen Oles
CPNI Compliance Officer
Delhi Telephone Company
DTC Cable, Inc.

February 28, 2008 (Revised September 17, 2008)

Attachment



Delhi Telephone Company – FCC 499 Filer ID 808848

DTC Cable, Inc. – FCC 499 Filer ID 826492

STATEMENT OF FCC CPNI RULE COMPLIANCE

This statement serves to explain how Delhi Telephone Company, an ILEC operating in New York, and its wholly-owned subsidiary DTC Cable, Inc., a reseller of long distance toll services (“the Companies”) are complying with Federal Communications Commission (“FCC”) rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC’s rules is called “customer proprietary network information” (“CPNI”). The FCC’s rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC’s rules (47 C.F.R. §§ 64.2009(e)).

As of this date, the Companies have not used nor plan to use CPNI for marketing. For marketing purposes, the Companies use customer billing name and address and/or telephone number without any segregation or refinement based on CPNI.

1. Identification of CPNI

The Companies have established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the FCC’s rules at Section 64.2003(d) of the FCC’s Part 64, Subpart U CPNI rules.

2. Identification of Services Affected by CPNI Rules

The Companies have established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services offered by the Companies that affect how the Companies use CPNI.

3. Identification of Permissible Uses of CPNI without Customer Authorization

The Companies have established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI not requiring customer authorization under the FCC’s Part 64, Subpart U, Section 64.2005.

4. Identification of Uses of CPNI Requiring Customer Authorization

The Companies have established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under the FCC’s rules at Part 64, Subpart U, Section 64.2005 and/or Section 64.2008(c) as circumstances require.

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5. Customer Notification and Authorization Process

Because the Companies have not or do not have plans at this time to use CPNI for marketing, the Companies have not implemented notice and approval procedures. However, the Companies' training and procedures have established appropriate awareness of the need for obtaining customer authorization to use CPNI for marketing purposes, and the specific notice and approval requirements under the FCC's Part 64, Subpart U CPNI rules. In the event the Companies undertake to use CPNI for marketing and provides written notification, the Companies' notification will comply with the requirements of the FCC's CPNI rules at Part 64, Subpart U, Section 64.2007(f)(2).

6. Training

The Companies have trained existing employees and will train new employees having access to CPNI regarding the FCC's CPNI rules.

7. Record of Customer CPNI Approval/Non-Approval

The Companies have developed a system for maintaining readily accessible record of whether and how a customer has responded under either Opt-In or Opt-Out approval as the case may be as required by Section 64.2009(a) of the FCC's Part 64, Subpart U CPNI rules.

8. Disciplinary Process

In compliance with Section 64.2009(b) of the FCC's Part 64, Subpart U CPNI rules, the Companies have in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under the FCC's CPNI rules.

9. Software Safeguards

Before undertaking to use CPNI for marketing purposes, the Companies will establish procedures for maintaining a record of sales and marketing campaigns that use CPNI in compliance with the requirements of Section 64.2009(c) of the FCC's Part 64, Subpart U CPNI rules.

10. Supervisory Review Process for Outbound Marketing

Before undertaking to use CPNI for outbound marketing purposes, the Companies will establish a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's Part 64, Subpart U CPNI rules.